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155 Pa. 375, 35 Am. St. Rep. 889, and approving *Roger v. Tinkler*, 16 Pa. Superior Ct. 460, where it was held that knowledge of the danger, such as is derivable from a week's experience with a machine, is not equivalent to a special warning. It does not necessarily follow that the employer is relieved from the duty of instructing him further.

MUTUAL BENEFIT SOCIETIES—QUALIFICATIONS OF MEMBERS.—A requirement of the constitution of a mutual benefit society, that its privileges shall be limited to members of a specified religious denomination is held, in *Franta v. Bohemian Roman Cath. C. U.* (Mo.), 54 L. R. A. 723, not to violate a provision of the State Constitution as to religious liberty.

See also *Mazurkiewicz v. Society* (Mich.), 54 L. R. A. 727.

But a provision in a certificate of membership in a benefit society, that the holder shall comply with the constitution and by-laws of the association, was held, in *Peterson v. Gibson* (Ill.), 54 L. R. A. 836, to refer to such laws as they then exist, and not to bind him to submit to a change subsequently made, depriving him of the right to dispose of the benefit by will.

See 7 Va. Law Reg. 812.

CARRIERS—NEGLIGENCE—COUPLING OF ENGINE WITH TRAIN.—A train having reached its terminus and being at a stand still, it is the duty of the carrier to give the passengers sufficient time to alight in safety before removing the train from the station. If the car was jolted, jarred or moved as the result of an attempted coupling, the effect is the same as when the train is started while the passengers are getting off. It is well settled that passengers are entitled to a reasonable time to leave the cars in safety. Therefore, if by the coupling of a shifting engine, a car is so moved as to cause a passenger to fall and receive injury, it is negligence. *Raughley v. West Jersey &c. R. Co.* (Pa.), 51 Atl. 597. Citing *R. R. Co. v. Kilgore*, 32 Pa. 292, 72 Am. Dec. 787; *R. R. Co. v. Peters*, 116 Pa. 217. Distinguishing *Herstine v. R. R. Co.*, 151 Pa. 252; *McCloskey v. R. R. Co.*, 156 Pa. 254.

BANKS AND BANKING—OFFICERS—INDIVIDUAL ACTS.—There is no reason founded on principle for not applying the same rule of agency to a cashier as to other persons holding a fiduciary relation. No person can act as agent in a transaction in which he has an interest, or to which he is a party, on the side opposite to his principal. Thus, a person cannot deal with the cashier of a bank as an individual, in securing a draft for a debt due by him, and claim, after the delivery of the draft, that it has become the transaction of the bank. Upon proof that the transaction was known to claimant to be an individual one, the burden is cast upon him to establish ratification. These are fundamental principles. *Campbell v. Mfrs. Nat. Bank* (N. J.), 51 Atl. 497. Citing *Clafstin v. Bank*, 25 N. Y. 293; *Moores v. Bank*, 111 U. S. 164; *Bank v. American Dock & Trust Co.*, 143 N. Y. 559; *Shaw v. Spencer*, 100 Mass. 382, 97 Am. Dec. 107; *Petrie v. Clark*, 11 Serg. & R. 377, 14 Am. Dec. 636; *Road Co. v. Paviour*, 164 N. Y. 281, 52 L. R. A. 790; *Lamson v. Beard* (C. C. A.), 94 Fed. 30, 45 L. R. A. 822.